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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

DAVID PIEGARO, Plaintiff, v. THE TRUSTEES OF PRINCETON UNIVERSITY and KENNETH E. STROTHER, JR., Defendants.	Civil Action No. 3:25-cv-13919 **COMPLAINT** **JURY TRIAL DEMANDED**

Plaintiff David Piegaro, by and through his undersigned counsel, submits this Complaint against Defendants The Trustees of Princeton University ("Princeton" or the "University") and Kenneth E. Strother, Jr. ("Chief Strother"), and alleges as follows:

INTRODUCTION

1. After six years of serving his country and the State of New Jersey in the U.S. Army and New Jersey National Guard, David Piegaro expected a peaceful learning experience at Princeton. Instead, Piegaro, a proud Jew, was physically assaulted on campus by Princeton's Chief of Police, baselessly charged with three indictable offenses and one disorderly persons offense, banned from campus for months, and kicked out of his on-campus housing.

2. On April 29, 2024—during yet another unrestrained pro-Hamas demonstration on Princeton's campus—Chief Strother grabbed Piegaro and, without justification, picked him up and dropped him down a flight of stone stairs. Princeton and Chief Strother had no reasonable excuse for this abhorrent conduct—so they made one up.

3. By the time Piegaro began observing and reporting on the demonstration (but not participating), several students had already been arrested, and a large crowd was vandalizing a Princeton bus. Princeton administrators ultimately capitulated to the mob's demands and released the arrestees. Shortly after the students' release, Piegaro witnessed three men—including a leader of Princeton's anti-Israel faculty group and a man in a black suit (later identified as Chief Strother)—speaking in the area between Whig and Clio Halls. Piegaro began recording them, thinking the interaction was newsworthy.

4. Once at the top of the Whig Hall stairs, Piegaro tried to peacefully enter the building after the men, which was still open to students. Rather than take any reasonable action in response to a student lawfully entering a campus building—such as doing nothing—Chief Strother inexplicably and violently yanked Piegaro by the arm and told him he was "under arrest." As one witness to the scene would later testify, Chief Strother then grabbed Piegaro with both hands, held his body open like a pair of scissors, and dropped Piegaro down the stone steps. Chief Strother then instructed a nearby Princeton police officer to handcuff Piegaro. Piegaro was so badly injured that he had to be transported to the emergency room that evening, where he was treated for a concussion, rib injuries, and multiple abrasions.

5. The next day, Princeton police ambushed Piegaro at University Health Services, told him he was banned from campus, confiscated his apartment keys, and escorted him to his car

without allowing him the opportunity to grab any essentials—a decency Princeton had afforded even violent students.

6. Princeton then criminally charged Piegaro based on Chief Strother's and other Princeton employees' knowingly false information described below, including claims that Piegaro assaulted Chief Strother and was warned the building was closed. Before trial, the prosecutor dismissed two of the indictable offenses and downgraded an aggravated assault charge to simple assault. And after suffering through a months-long sham Princeton internal disciplinary investigation, Piegaro was forced to undergo a criminal trial based on Chief Strother's and other Princeton employees' lies—ones they maintained in the face of blatantly contradictory evidence. At trial, the prosecutor dismissed the trespass charge, and the court found Piegaro not guilty of simple assault, the last remaining charge.

7. Defendants' deliberate actions and subsequent cover up constitute serious constitutional violations. As a veteran, Piegaro seeks the same justice and protections he fought to preserve for others.

JURISDICTION AND VENUE

8. This Court has subject-matter jurisdiction pursuant to 28 U.S.C. § 1331 because this action arises under the Constitution and laws of the United States, as the claims stated in this Complaint raise federal questions under 42 U.S.C. § 1983. This Court has supplemental jurisdiction under 28 U.S.C. § 1367 over Plaintiff's claims arising under state law because those claims form part of the same case or controversy as Plaintiff's federal claims.

9. This Court has personal jurisdiction over Princeton because it is based and operates in New Jersey.

10. This Court has personal jurisdiction over Chief Strother because he has purposefully availed himself of the laws of this judicial district through his continued employment

at Princeton. Plaintiff's claims arose in this judicial district and in connection with Chief Strother's employment at Princeton.

11. Venue is proper in the District of New Jersey pursuant to 28 U.S.C. §§ 1391(b)(2) because a substantial part of the events or omissions giving rise to this claim occurred in this District.

PARTIES

12. Plaintiff David Piegaro is a United States citizen and a resident of New Jersey and was, at all relevant times, a full-time undergraduate student at Princeton. Piegaro is Jewish and a U.S. Army veteran who served honorably as an intelligence analyst with top-secret security clearance. Piegaro also served honorably in the New Jersey National Guard before attending Princeton and throughout his freshman and sophomore years.

13. Defendant Princeton is a state-chartered university, with its principal place of business in Princeton, New Jersey. At all relevant times, Princeton employed, and still employs, Chief Strother.

14. Princeton maintains its own police department, known as the Department of Public Safety ("DPS"). DPS is made up of twelve divisions, including Sworn Officers, which are supervised by the Office of the Assistant Vice President for Public Safety, led by Chief Strother.

15. DPS Sworn Officers are appointed by Princeton and must complete the same police academies and annual training as their municipal counterparts. They have the authority of commissioned police officers with full power of arrest under N.J.S.A. 18A:6-4.5, which provides that University police officers "shall possess all the powers of policemen and constables in criminal cases and offenses against the law anywhere in [New Jersey] . . . , pursuant to any limitations as may be imposed by the governing body of the institution which appointed and commissioned the person."

16. Defendant Chief Strother is a Sworn Officer of DPS, serving at all relevant times as an officer, administrator, and agent of Princeton, including through his roles as Assistant Vice President for Public Safety and Chief of Police. Chief Strother has over 30 years of experience as a police officer, having previously served as Captain of the Willingboro Township Police Department and Station Commander for Penn State University Police. At all relevant times, Chief Strother enjoyed police power under N.J.S.A. 18A:6-4.5, and acted under color of state law in the performance of his duties as a police officer and/or policymaker, decisionmaker, and supervisor of Princeton's police department and officers.

17. Chief Strother is sued in his individual and official capacities.

FACTUAL ALLEGATIONS

A. Antisemitism Spreads at Princeton Following Hamas's October 7 Massacre.

18. On October 7, 2023, Hamas launched an unprovoked surprise attack on Israel, engaging in depraved acts of murder, torture, rape, violence, and kidnapping. Thousands of armed terrorists invaded southern Israel, while others launched thousands of rockets toward Israeli civilians. Once inside Israel, the terrorists, acting as well-armed death squads, dispersed into Israeli towns shooting, raping, torturing, burning, and mutilating unarmed civilians, including infants, children, and the elderly, taking hundreds of hostages and engaging in mass murder and rape at a music festival. By the time the terrorists were repelled, Hamas had killed 1,200 people and abducted over 200 more. October 7 was the single deadliest day for Jews since the Holocaust. Senior Hamas officials have vowed that October 7 was "just the first time, and there will be a second, a third, a fourth," promising another "October 7, October 10, October one-millionth." When the Hamas leader who used this language was asked whether he meant to call for the complete annihilation of Israel, he replied, "Yes, of course."

19. Many Princeton students and faculty members celebrated, justified, and excused Hamas's mass rape, murder, and kidnapping. Many resorted to harassment against Jewish students.

20. On October 13, 2023, just five days after Hamas's massacre, Princeton Students for Justice in Palestine held an event at which attendees called for the destruction of Israel and its Jewish inhabitants. Princeton failed to respond.

21. That unhinged event was just the first of many. Throughout the school year, hundreds of Princeton students staged walkouts on campus, chanting genocidal statements such as "from Princeton to Gaza, globalize the Intifada," and "long live the Intifada."[1] Though uniformed Public Safety officers and Princeton administrators were present at these events, they took no action against repeated calls for the mass murder of Jews. Similar incidents of antisemitism continued to go unchecked.

22. In April 2024, a new wave of organized antisemitic protests at college campuses around the country began, involving tent encampments erected by students and others in outdoor spaces. These encampments were hotbeds of flagrant legal and policy violations and intimidation, harassment, and physical assault of Jewish students, including blocking Jewish students from access to public spaces and campus buildings.

23. On April 24, 2024, Piegaro was horrified—albeit unsurprised—to learn that Princeton community members were planning an encampment of their own. Piegaro and his friend, a recent Princeton graduate, informed Princeton administrators about these plans. Piegaro

[1] "Intifada" refers to organized terrorist campaigns of indiscriminate attacks on Israeli civilians. The Intifadas were effected through suicide bombs and other methods, including bombs filled with nails dipped in rat poison.

and his friend continued to disclose details to Princeton administrators about the disruptors' plans as they developed.

24. Shortly thereafter, Princeton's Vice President for Campus Life, W. Rochelle Calhoun, issued a warning to all Princeton undergraduate students:

> Any individual involved in an encampment, occupation, or other unlawful disruptive conduct who refuses to stop after a warning will be arrested and immediately barred from campus. . . .
>
> For students, such exclusion from campus would jeopardize their ability to complete the semester. In addition, members of our community would face a disciplinary process (for students this could lead to suspension, delay of a diploma, or expulsion).

25. Piegaro played a key role in Princeton's ability to issue this timely warning to its community members. This email was the first message to the entire undergraduate student body threatening potential disciplinary action in response to such conduct. Yet Princeton's response to antisemitic and violent protestors paled in comparison to its eventual treatment of Piegaro.

26. Despite Princeton's warning, at around 7:00 a.m. on April 25, 2024, about forty individuals set up the "Gaza Solidarity Encampment" in McCosh Courtyard. By 12:00 p.m., approximately 250 agitators, including students and faculty, had descended on the courtyard to participate in "an international student intifada for Palestinian liberation." Over the next five days, the agitators maintained their encampment: they praised Hamas; justified the massacre, rape, and kidnapping of Jews on October 7; repeated chants for genocide against the Jewish people, including "Globalize the Intifada," and "there is only one solution, Intifada revolution," loud enough that students were unable to hear their lectures; waived a Hezbollah flag; and displayed a sign supporting a Popular Front for the Liberation of Palestine official who assassinated an Israeli minister. Both Hezbollah and the Popular Front for the Liberation of Palestine are U.S.-designated terrorist organizations.

B. April 29: Plaintiff Piegaro Is Assaulted by Princeton's Chief of Police.

27. On April 29, 2024, the Council of the Princeton University Committee—a permanent conference of Princeton faculty, student, staff, and alumni representatives with meetings open to all in the University community—hosted one of its regularly scheduled meetings in Frist Campus Center. Protesting students attended to disrupt it.

28. Meanwhile, a group of students and faculty marched past Frist Campus Center toward Clio Hall, which borders McCosh Courtyard and houses Princeton Graduate School's administrative offices. The mob occupied Clio Hall and attempted to force the University to negotiate with Princeton Israeli Apartheid Divest, a student group calling for Princeton's divestment from Israel.

29. DPS officers warned the occupiers that anyone remaining in Clio Hall after 5:30 p.m. would be arrested. At least thirteen demonstrators chose to remain, deliberately violating the officers' orders, while a mob of approximately 200 others surrounded Clio Hall, chanting and banging on buckets in support of the demonstrators inside.

30. At around 5:55 p.m., Piegaro learned of the commotion at Clio Hall and went to observe and report. Piegaro intended to, and did, act as a neutral journalist. Piegaro posted videos, photos, and information about the events on X (formerly Twitter). Piegaro also attempted to contact several journalists. Piegaro felt that it was his civic duty to keep students, the Princeton administration, and news outlets informed about these disruptors' activities.

31. At around 6:00 p.m., DPS arrested and escorted from Clio Hall two of the student-occupiers, moving them to a Princeton bus outside the building. Demonstrators blocked the doors of Clio Hall to prevent DPS officers from removing the other occupiers remaining inside. DPS eventually arrested the other eleven occupiers, but they were not moved onto the bus.

32. The large crowd then surrounded the bus to prevent police officers from transporting the detainees. The mob began banging on the bus and shouting, "Let them go," breaking the bus's window. Others wedged safety cones in the wheels to stop it from moving.

33. Piegaro arrived at McCosh Courtyard around 6:05 p.m., while the siege outside the bus was in full swing. Piegaro was lawfully on campus and took photos and videos of the scene outside Clio Hall, while maintaining a safe distance from the activities—not only because he did not support the unlawful actions of the agitators, but because he was concerned for his safety as a Jew.

34. Piegaro entered some of the nearby buildings to see if he could get better angles for photos and videos while remaining safe. Around 6:15 p.m., Piegaro used his Princeton ID to enter Edwards Hall to take photos and videos of the scene. A few minutes later, Piegaro lawfully entered Whig Hall. After being unable to find a suitable vantage, Piegaro went back outside. Other Princeton students were also able to enter Whig Hall using their Princeton IDs around the same time without incident.

35. Around 6:52 p.m., Princeton capitulated to the protestors' demands and released from custody the arrested students, including those detained on the Princeton bus.

36. At approximately 7:45 p.m., Piegaro witnessed a man in a black suit—who Piegaro later learned was Chief Strother—speaking with two other men, one of whom he recognized as a prominent leader of Princeton's Faculty for Justice in Palestine ("FJP") group, Professor Max Weiss. Piegaro calmly approached the group of men, who were walking outside of Whig Hall. Chief Strother told Piegaro that they were having a private discussion. Piegaro responded respectfully that he had a right to be present in a public location.

37. At this point, Piegaro began videorecording the group. The men walked toward Whig Hall—the building Piegaro had just lawfully been in. The four individuals then walked to the top of Whig Hall's marble entrance stairs. At the top, Piegaro politely asked, "What's your name, sir? And position here?" Chief Strother—who was not wearing a uniform, badge, DPS shirt, body-worn camera, or any other indicator that he was a police officer—ignored Piegaro and used his Princeton ID to tap into Whig Hall.

38. Chief Strother did not instruct Piegaro that he should leave the steps of Whig Hall or claim that Whig Hall was closed (it was not). Rather he held open the door and allowed Professor Weiss and the other man—later identified as Professor Zia Mian—to enter. Piegaro then attempted to walk through the door Chief Strother was holding open.

39. Without warning, justification, or probable cause, Chief Strother, who is much larger than Piegaro, grabbed Piegaro's arm and violently pulled him back from the door while yelling that Piegaro was "under arrest." Piegaro had neither touched nor made any aggressive or threatening move toward Chief Strother. Piegaro pleaded with Chief Strother not to touch him. Chief Strother, however, refused to release Piegaro.

40. Rather than simply detaining Piegaro—who was not physically resisting—Chief Strother unjustifiably picked Piegaro up with both hands and dropped him down the stone steps of Whig Hall. The fall left Piegaro in severe pain with physical injuries at the bottom of the steps.

41. The gratuitously aggressive assault was witnessed by a graduate student who contemporaneously reported, and later testified in court, that "[a] man was holding David horizontally like an open pair of scissors and then appeared to drop David down the stairs."

42. As Piegaro lay at the bottom of the steps, grabbing his ribs in pain, Chief Strother walked down the stairs and grabbed Piegaro by the wrist to keep him restrained on the ground.

Chief Strother then called a nearby uniformed DPS police officer, John Neiman, to handcuff Piegaro. DPS Detective Martin Krzywicki arrived on the scene a few moments later to assist with the arrest.

43. Officer Neiman, followed by Detective Krzywicki, transported Piegaro to DPS headquarters in a marked patrol vehicle. In the car, Piegaro complained of pain in his ribs but when they arrived at headquarters, Detective Krzywicki placed Piegaro in a holding cell. Later, in response to Piegaro's repeated complaints about his pain following Chief Strother's assault, Detective Krzywicki coordinated an ambulance to transport Piegaro to Princeton Medical Center ("PMC").

44. Piegaro's X-rays and CT scan revealed that, as a result of Chief Strother's assault, Piegaro had sustained rib injuries and a concussion. Piegaro also sustained multiple abrasions in the attack and was given a spirometer to aid his lungs.

45. Around three-and-a-half hours after his arrest, Piegaro arrived back at DPS headquarters where he was photographed and fingerprinted.

46. Four-and-a half hours after his arrest, at or around 12:21 a.m. on April 30, Piegaro was finally released from DPS custody and given a copy of the criminal complaint and summons against him.

47. Piegaro was charged with three indictable offenses: (1) fourth degree aggravated assault on a police officer in violation of N.J.S.A. 2C:12-1(b)(5)(A); (2) fourth degree obstructing the administration of the law in violation of N.J.S.A. 2C:29-1(a); and (3) third degree resisting arrest with use of physical force in violation of N.J.S.A. 2C:29-(2)(a)(3). Piegaro was also charged with defiant trespass in violation of N.J.S.A. 2C:18-3(b), a disorderly persons offense.

48. As explained below, all four charges were based on knowingly false information provided by Chief Strother to the other DPS employees involved. Chief Strother knew that the charges and allegations that he caused to be made in the criminal complaint against Piegaro were false and without basis in law or fact.

49. Piegaro informed Detective Krzywicki multiple times that he wanted to file a criminal complaint against Chief Strother, but was told he could not do so. Instead, Piegaro was only permitted to file an internal affairs complaint.

C. April 30: DPS Officers Ambush Piegaro and Princeton Bans Piegaro from Campus.

50. On April 30, Piegaro went to the University Health Services to get further treatment for his injuries. Another X-ray confirmed the same diagnoses as he had the night before at PMC.

51. While Piegaro was at his appointment, DPS dispatched DPS sworn officer Maleci Malec to University Health Services. Chief Strother said in his arrest narrative, and testified at trial, that he told DPS officers that Piegaro was banned from campus immediately after Piegaro's arrest.

52. As Piegaro left his appointment, he was approached in the lobby by Officer Malec, who told Piegaro that he was in violation of his campus ban by his presence at the on-campus medical clinic. Until that point, however, no one had told Piegaro that he was (wrongfully) banned from campus.

53. Officer Malec contacted DPS's Communications Center to determine whether there was a "Short-Term Persona Non Grata (PNG) Notice." DPS confirmed there was no PNG Notice on file for Piegaro.

54. After conferring with other DPS officers, and after Chief Strother told the officers that Piegaro was "supposed to be barred," Officer Malec informed Piegaro that he had been banned from campus, including from his on-campus apartment. Officer Malec told Piegaro that someone

from the Office of the Dean of Undergraduate Students would contact him to discuss retrieving items from his apartment and then confiscated Piegaro's apartment keys. Officer Malec immediately removed Piegaro from campus, with no prior warning or written notice, and no alternative accommodations, forcing him to scramble to find a place to sleep.

55. It was not until the next day, May 1, that Piegaro received any formal communication from Princeton about this campus ban. Piegaro received a letter from Regan Crotty, Dean of Undergraduate Students, officially notifying Piegaro that he was banned "from the University's campus, effectively immediately." The letter stated that Piegaro would not be permitted on campus, including for any seated exams or in-person presentations (though this part was later modified), and would be arrested (again) and subjected to discipline if he failed to comply. The letter also notified Piegaro that Princeton had begun to investigate his so-called "misconduct," and was considering disciplinary charges. Piegaro's campus ban remained in place until late July.

56. The differences in how, Piegaro—a passive bystander—and the Clio Hall agitators were treated is outrageous. Princeton released the thirteen Clio Hall vandals after negotiating with the mob of protestors who had blocked campus and interfered with police. Videos show Professor Weiss informing the protestors of the deal that he, DPS, and Princeton had agreed upon: if the protestors stopped blocking the roadway, Princeton would release them, allow them to get their belongings, and then issue summonses to the students who had been arrested after they turned themselves in.

57. Piegaro, meanwhile, was taken into custody and held at DPS headquarters, and not permitted to collect belongings from his campus apartment for days.

58. Between May and October 2024, Princeton investigators assigned to Piegaro's case interviewed witnesses about the incident: Piegaro in June and July; Professors Weiss and Mian in August; and the graduate student who witnessed the attack in August. Although the graduate student corroborated Piegaro's account of Chief Strother's attack, at no point did any investigator interview Chief Strother or any of the other officers involved in the incident.

59. During the interview of the graduate student who witnessed the attack, the Princeton investigator stated that the investigation likely would not lead to any disciplinary action because interviewees' accounts were so inconsistent. Yet on October 9, 2024, on the back of Chief Strother and DPS's false narrative, and despite having evidence refuting that narrative, Princeton placed Piegaro on disciplinary probation for nine months.

60. But Princeton offered the Clio Hall occupiers—who were not attacked by Chief Strother—a restorative justice option that it did not extend to Piegaro. Princeton's actions smack of retaliation and were blatant attempts to discourage Piegaro from pursuing charges or filing a civil complaint against Chief Strother.

61. On September 29, 2024, Piegaro emailed Melissa Chesanko, Assistant Dean for Student Life, seeking a no-contact order against Chief Strother out of fear of further retaliation and being forced to relive his assault. In October 2024, Piegaro was attending a vigil commemorating the victims of the October 7 attacks when he noticed Chief Strother. As predicted, Piegaro immediately felt physical and emotional distress and ultimately left the vigil.

62. The stress of the arrest, criminal charges, his physical injuries, being ousted from his home, and Princeton's sham investigation severely impacted Piegaro's mental health. As a direct result of Chief Strother's assault and Princeton's subsequent actions, Piegaro has recurring

vivid dreams of his assault, was diagnosed with anxiety and post-traumatic stress disorder, and was prescribed medication.

D. Chief Strother Provides Knowingly False Reports of the Attack.

63. On May 1 and 2, Chief Strother filed written reports of the incident. His report is filled with false statements designed to protect himself and to ensure Piegaro's arrest and criminal charges could be maintained.

64. Chief Strother asserted in his arrest report narrative, for example, that he "knew [Whig Hall] was locked"—seemingly as a justification for his decision to physically prevent Piegaro from entering Whig Hall and the trespass charge. But Whig Hall was not locked; Piegaro entered Whig Hall without incident around 6:30 p.m, and other Princeton students arrived at Whig Hall at least a few minutes before 7:55 p.m. for the annual Whig-Clio Senior Roast, scheduled to start at 8:00 p.m. One student entered Whig Hall at 7:56 p.m., and had also entered Whig Hall earlier that night, at approximately 6:20 p.m. At 8:09 p.m., the event host canceled the Senior Roast of its own volition because of the protests outside, not because the building was closed.

65. Chief Strother maintained the lie—that Whig Hall was locked and that is why he physically assaulted Piegaro—throughout Princeton's investigation. Chief Strother told Joyce Chen, the Deputy Dean of Undergraduate Students who was assigned to Piegaro's case, for example, that Whig Hall had been manually locked at 5:56 p.m. on the day of Piegaro's arrest. Chief Strother declined Chen's request to see the building access records for Whig Hall on that day because, he said without explanation, it could "provide a conflict for the ongoing criminal case against" Piegaro. Chief Strother further maintained the locked-building lie in his testimony at Piegaro's criminal trial.

66. Chief Strother also falsely testified that he put his arm out to block Piegaro from entering Whig Hall before he grabbed Piegaro's arm, and that Piegaro was first to make physical

contact by grabbing Strother's outstretched arm. This self-serving story is contradicted by several pieces of evidence. Video evidence shows Chief Strother attempting to hastily throw his entire body in front of Piegaro as Piegaro attempted to enter Whig Hall, before ramming into Piegaro. Chief Strother grabbed Piegaro's arm and yanked him backward. There was no time for Chief Strother to put his arm out as he claimed, nor is it accurate that Piegaro touched him first.

67. Chief Strother also falsely claimed in his arrest report and at trial that he told Piegaro that the building was closed after he outstretched his arm. Video evidence confirms that Chief Strother did not say the building was closed at any point before he assaulted Piegaro—giving Piegaro no time to process what was going on or to make any sort of determination that Chief Strother might be a person with authority.

68. Chief Strother falsely claimed that Piegaro's efforts to pull away caused Chief Strother to lose his grip on Piegaro, causing Piegaro to fall down the stairs. But Chief Strother held Piegaro's upper arms, gaining control over Piegaro. When Piegaro was at the bottom of the Whig Hall steps writhing in pain, just a few seconds after he hit the sidewalk, the first thing he said was, "He threw me down the stairs."

69. Chief Strother's sworn statements similarly do not match first-hand accounts of neutral witnesses. One witness, a graduate student who later testified in court, said she saw Chief Strother "holding David horizontally like an open pair of scissors and then appeared to drop David down the stairs." She explained that while Strother was holding Piegaro horizontally, Piegaro "***was frozen, not struggling, [and] [t]hen the guy dropped him***." When asked about this incident during Princeton's investigation, this witness told the University investigator that DPS's narrative that Piegaro "fell backwards struggling to get away from [Strother] . . . was not at all consistent with what [she] saw." The witness explained that she "remember[s] it vividly because [sh]e

thought it was so strange [and] ***shock[ing] that someone that looked like a University administrator was holding a student***."

70. Chief Strother also wrote in his arrest report narrative that immediately after Piegaro was placed in the patrol car, Chief Strother told the "duty supervisor" that Piegaro was banned from campus and must depart university property "after [they] provide an escort to his dorm room to retrieve personal items." During his testimony at Piegaro's criminal trial, Chief Strother contradicted this statement and testified that he told the "arresting officers" about Piegaro's ban.

71. Yet neither Officer Neiman nor Detective Krzywicki's arrest narratives mention that Chief Strother ever said Piegaro was banned from campus. Further, when DPS ambushed Piegaro at University Health Services, DPS confirmed that there was no campus ban in place at that time. Chief Strother even testified at Piegaro's criminal trial that he does not even have the authority to ban any student from campus.

72. Chief Strother's false account of the incident is entirely divorced from reality. According to Chief Strother, he had used a "de-escalation method or tactic" before resorting to physical force—namely, "providing [a] warning." Strother never identified himself as a police officer, said the building was off limits to students, provided any warning, or offered any other explanation for why Piegaro should have allowed Chief Strother to attack him. Tellingly, in his arrest reports, Chief Strother cunningly described Piegaro as an "active assailant"—a buzzword the New Jersey Attorney General classifies as the highest level of resistance against which deadly force may be used.

73. Chief Strother's story is filled with a number of omissions. His reports contain no description of Piegaro asking Chief Strother who he was and that Chief Strother, dressed in civilian

clothes, refused to respond and did not otherwise indicate he was a police officer. During Piegaro's trial, Chief Strother testified that he did not recall whether he heard Piegaro's questions about who Strother was and confirmed that he did not answer.

74. Chief Strother further testified that he was not wearing a uniform, badge, body-worn camera, or DPS shirt, but a plain suit. To muster some basis that Piegaro should have known he was a police officer, as was necessary for the charges Princeton filed against Piegaro, Chief Strother testified that he was holding a police radio in his left hand immediately before the physical altercation took place. But video evidence confirms Chief Strother had only a bright yellow cellphone in his left hand at least until he grabbed Piegaro, and he had nothing in his right hand. On cross-examination, Strother admitted that there was "nothing physical" about him that day that would have identified him as a member of law enforcement.

75. Detective Krzywicki's arrest report narrative similarly parrots Chief Strother's falsehoods and reflects a complete failure to conduct any actual detective work. He asserted that Chief Strother had communicated with the protestors multiple times such that it was "clear that Chief Strother was a law enforcement officer." But Piegaro was not involved in the protests, and was not privy to Chief Strother's communications with the disruptors. During the incident, Chief Strother showed no indication that he was a law enforcement officer. Detective Krzywicki, who issued the criminal complaint and summons against Piegaro, relied exclusively on Chief Strother's version of the events and failed to interview Piegaro or review any of Piegaro's evidence before bringing three serious indictable offenses and one disorderly persons offense against Piegaro, even after Piegaro gave his internal affairs statement to Sergeant Ross.

76. Detective Krzywicki's criminal complaint similarly contains false statements and material omissions. The affidavit of probable cause within the criminal complaint reads, in total:

1. Description of relevant facts and circumstances which support probable cause that (1) the offense(s) was committed and (2) the defendant is the one who committed it:

The Chief of the Police personally observed and reported the offense.

2. I am aware of the facts above because: (Included, but not limited to: your observations, statements of eyewitnesses, defendant's admission, etc.)

I talked with the Chief who related to me what transpired.

3. If victim was injured, provide the extent of the injury:

None.

Detective Krzywicki's responses confirm that he relied only on the words of Chief Strother and did not speak to any other eyewitnesses about the incident.

77. In fact, no one at DPS conducted even a cursory investigation into the incident at Whig Hall. They confiscated Piegaro's phone, preventing Piegaro from showing them the videos he took of the assault. Once officers returned to DPS headquarters and allowed Piegaro to give his statement for the internal affairs complaint, DPS still did not take copies of the videos as evidence.

78. In recognition that the charges were without any foundation, in June and July 2024, the Mercer County Prosecutor's Office dismissed the obstruction and resisting arrest charges against Piegaro, and reduced his aggravated assault charge to simple assault. In February 2025, at the end of a two-day bench trial in Princeton Municipal Court, the prosecution dismissed the defiant trespass charge.

79. On April 1, 2025, after waiting almost a year for justice, Piegaro was found not guilty of the only remaining charge, simple assault.

80. Just two days after Piegaro was acquitted, Princeton solidified its commitment to protecting Chief Strother by naming him one of six Princeton staff members honored with the President's Achievement Award. And in June 2025, the prosecutor dropped defiant trespass charges against the Clio Hall occupiers in exchange for a paltry penance: six hours of community service and an apology letter, which the judge required them to rewrite because it read like a "political manifesto."

81. Having found no justice through his many complaints, Piegaro now brings this complaint for damages, declaratory, and injunctive relief relating to Defendants' violations of his federal and state constitutional rights, as well as New Jersey law.

FIRST CAUSE OF ACTION

Against Chief Strother
Violation of the First and Fourteenth Amendments to the U.S. Constitution
Violation of Art. I, §§ 6 and 18 of the N.J. Constitution
Free Speech, Free Press, Free Assembly, Right to Record, Retaliation
(Pursuant to 42 U.S.C. § 1983 and N.J.S.A. 10:6-2)

82. Piegaro hereby repeats, re-alleges, and incorporates the allegations set forth in the preceding paragraphs as if fully set forth herein.

83. Along with protecting free speech, free press, and free assembly, the First Amendment to the United States Constitution and Article I of the New Jersey Constitution protect the right to record activity, including police activity, in public areas.

84. On April 29, 2024, Piegaro was lawfully exercising his constitutional rights to free speech, free press, free assembly, and to record police actions in furtherance of the public's right of access to information. He was reporting on a matter of public concern in a time and at a place where he was authorized to be.

85. Chief Strother violated Piegaro's rights under the First Amendment and Article I of the New Jersey Constitution when he dropped Piegaro down the stairs of Whig Hall to prevent him from engaging in constitutionally protected conduct.

86. Chief Strother was aware that Piegaro was observing and recording the protest and the Princeton administration's response as part of his federal and state constitutional rights. Despite not being required to, Piegaro even informed Chief Strother he had a right to be present in that public place.

87. Chief Strother also unconstitutionally retaliated against Piegaro in violation of the First Amendment and Article I, when he assaulted and arrested him in retaliation for recording police activity in public, namely Chief Strother's conversations with two prominent FJP leaders concerning ongoing demonstrations on campus. Chief Strother first attempted to prevent Piegaro from lawfully observing and recording by telling him they were having a private conversation. Chief Strother retaliated against Piegaro for continuing to exercise his rights by grabbing him and dropping him down the stairs of Whig Hall.

88. Chief Strother consciously or recklessly disregarded Piegaro's rights when he willfully, deliberately, and maliciously seized and arrested him without probable cause in retaliation for his exercising his First Amendment and Article I constitutional rights by recording Chief Strother's public conversation. Chief Strother's actions would chill a person of ordinary firmness from exercising his First Amendment and Article I rights, and did chill Piegaro from exercising those rights.

89. Chief Strother acted under color of state law when he prevented Piegaro from exercising his First Amendment and Article I rights.

90. As a direct and proximate result of Chief Strother's actions, Piegaro suffered damages, including physical injuries, economic injuries, and severe emotional distress, including post-traumatic stress disorder and anxiety. The deterioration in his mental health has interfered with his ability to sleep and function day-to-day. Piegaro now takes medication and regularly sees a therapist for his symptoms.

91. Accordingly, Piegaro is entitled to a judgment declaring that Chief Strother violated Piegaro's constitutional rights, including the right to record and report on matters of public concern and police activities without retaliation, and to all damages arising out of these violations.

SECOND CAUSE OF ACTION

Against Chief Strother
Violation of the Fourth and Fourteenth Amendments to the U.S. Constitution
Violation of Article I, § 7 of the N.J. Constitution
Unlawful Arrest and False Imprisonment
(Pursuant to 42 U.S.C. § 1983 and N.J.S.A. 10:6-2)

92. Piegaro hereby repeats, re-alleges, and incorporates the allegations set forth in the preceding paragraphs as if fully set forth herein.

93. The Fourth Amendment and Article I prohibit "unreasonable searches and seizures," which at a minimum, requires arresting officers to have probable cause that the arrestee has committed a crime. Piegaro's seizure and arrest was objectively unreasonable as it was effectuated without a warrant and without probable cause. Nor could the arresting officers have reasonably believed they had probable cause. Because Piegaro's initial arrest was unlawful, Piegaro's subsequent imprisonment was also unlawful.

94. Chief Strother unlawfully seized Piegaro when he stopped his freedom of movement, grabbed him, picked him up, dropped him down the stairs of Whig Hall, held him face-down on the ground by his wrist, and ordered him handcuffed without probable cause. Piegaro had not committed a crime and did not pose a threat to anyone. He was lawfully and peacefully

exercising his right to record in public and actively asserted that right to Chief Strother. Chief Strother consciously or recklessly disregarded Piegaro's rights when he willfully, deliberately, and maliciously arrested and imprisoned him without probable cause.

95. Pursuant to this arrest made without probable cause, and on Chief Strother's orders, Piegaro was taken into custody and imprisoned at DPS headquarters, and remained imprisoned during his trip to PMC. He was photographed, fingerprinted, and charged after being imprisoned for several hours.

96. Chief Strother acted under color of state law when he unlawfully arrested and imprisoned Piegaro without probable cause.

97. As a direct and proximate result of Chief Strother's actions, Piegaro suffered damages, including physical injuries, economic injuries, and severe emotional distress, including post-traumatic stress disorder and anxiety. The deterioration in his mental health has interfered with his ability to sleep and function day-to-day. Piegaro now takes medication and regularly sees a therapist for his symptoms.

98. Accordingly, Piegaro is entitled to a judgment declaring that Chief Strother violated Piegaro's constitutional rights, including the right to be free from arrest and imprisonment without probable cause, and to all damages arising out of these violations.

THIRD CAUSE OF ACTION

Against Chief Strother
Violation of the Fourth and Fourteenth Amendments to the U.S. Constitution
Violation of Article I, § 7 of the N.J. Constitution
Excessive Force
(Pursuant to 42 U.S.C. § 1983 and N.J.S.A. 10:6-2)

99. Piegaro hereby repeats, re-alleges, and incorporates the allegations set forth in the preceding paragraphs as if fully set forth herein.

100. The Fourth Amendment and Article I prohibit "unreasonable searches and seizures." Piegaro's arrest constituted an unreasonable seizure because Chief Strother deliberately used excessive force under the circumstances when he aggressively grabbed Piegaro's arm, violently pulled him, picked him up, dropped him down the stairs, held him face-down on the ground by his wrist, and ordered him handcuffed him without justification while Piegaro was acting lawfully, had committed no crime, and did not pose any threat to any other person.

101. Chief Strother consciously or recklessly disregarded Piegaro's rights when he willfully, deliberately, and maliciously grabbed him, pulled him, picked him up, dropped him down the stairs, and held him face-down on the ground by his wrist, causing serious injury.

102. Chief Strother acted under color of state law when he used excessive force against Piegaro.

103. As a direct and proximate result of Chief Strother's actions, Piegaro suffered damages, including physical injuries, economic injuries, and severe emotional distress, including post-traumatic stress disorder and anxiety. The deterioration in his mental health has interfered with his ability to sleep and function day-to-day. Piegaro now takes medication and regularly sees a therapist for his symptoms.

104. Accordingly, Piegaro is entitled to a judgment declaring that Chief Strother violated Piegaro's constitutional rights, including the right to not be subjected to arrest and injury through the intentional use of unreasonable levels of force while posing no danger to the police, and to all damages arising out of these violations.

FOURTH CAUSE OF ACTION

Against Chief Strother and Princeton
Assault and Battery

105. Piegaro hereby repeats, re-alleges, and incorporates the allegations set forth in the preceding paragraphs as if fully set forth herein

106. Chief Strother, acting in his individual capacity and in his capacity as an employee of Princeton University, committed unlawful and unwarranted assault and battery when he deliberately grabbed Piegaro, picked him up, and dropped him down the steps of Whig Hall, both intending and causing Piegaro to be placed in imminent apprehension of (and suffering) harmful or offensive contact.

107. As a direct and proximate result of Chief Strother's and Princeton's actions, Piegaro suffered damages, including physical injuries, economic injuries, and severe emotional distress, including post-traumatic stress disorder and anxiety. The deterioration in his mental health has interfered with his ability to sleep and function day-to-day. Piegaro now takes medication and regularly sees a therapist for his symptoms.

108. Princeton is vicariously liable for Chief Strother's assault and battery in violation of New Jersey law because it occurred within the scope of his employment and was motivated, at least in part, by a desire or intention to serve Princeton. Chief Strother grabbed and arrested Piegaro under his authority and responsibilities as Chief of Police to enforce the law and rules of the school.

FIFTH CAUSE OF ACTION

Against Chief Strother and Princeton
Violation of the Fourth and Fourteenth Amendments to the U.S. Constitution
Malicious Prosecution
(Pursuant to 42 U.S.C. § 1983 and Common Law)

109. Piegaro hereby repeats, re-alleges, and incorporates the allegations set forth in the preceding paragraphs as if fully set forth herein.

110. Chief Strother and Princeton initiated criminal proceedings against Piegaro in Princeton Municipal Court through Chief Strother's report to Detective Krzywicki, which formed the basis for the criminal complaint against Piegaro, and when he verbally notified the prosecutor to begin prosecution.

111. The proceeding resulted in a seizure when Piegaro suffered a deprivation of liberty through required attendance at hearings and trial. Piegaro was forced to attend several court hearings because of the legal proceedings maliciously instituted and maintained by Chief Strother, which caused Piegaro to miss out on important personal events, including wedding festivities.

112. The criminal proceeding resolved in Piegaro's favor when the prosecution dropped three out of the four charges by the close of trial, and he was acquitted of the only remaining charge after a two-day trial.

113. Defendants initiated, maintained, and pursued the charges against Piegaro without probable cause based on knowingly, willfully, and maliciously misrepresented key material facts to the charging officer and to the prosecutor in arrest reports and at trial. Chief Strother falsely stated in his arrest report that Piegaro fell down the steps (rather than being deliberately picked up and dropped), that he told Piegaro that Whig Hall was closed, that he used a "de-escalation method or tactic" by "providing [a] warning," and that Piegaro was an "active assailant" who pushed into and grabbed him, among other falsehoods. Strother also falsely testified at trial that Piegaro fell down the steps, that Whig Hall was closed at the time of the altercation, and that he was holding a police radio in his left hand. Video evidence and other trial testimony directly contradicts Strother's lies—in reality, Chief Strother did not inform Piegaro that Whig Hall was closed (because it was not), he escalated the situation by initiating physical contact and dropping Piegaro down the steps, and he was not wearing a police radio or any other identifying clothing. Chief

Strother's blatant falsehoods undermine any notion that probable cause existed to believe Piegaro was committing a crime, much less the ones he was charged with.

114. Defendants maliciously initiated and maintained the criminal proceeding against Piegaro without probable cause for a reason other than to bring Piegaro to justice, namely to attempt to cover up Chief Strother's own unprovoked and vicious attack on a student exercising his constitutional rights in an authorized time and place. Princeton police failed to interview unbiased eyewitnesses, and maintained criminal charges designed to intimidate and discourage Piegaro from taking legal action against Chief Strother or speaking out about the school's discriminatory and unequal treatment throughout Princeton's internal disciplinary process.

115. Princeton is independently and vicariously liable for Chief Strother's malicious prosecution in violation of New Jersey law because it occurred within the scope of his employment and was motivated, at least in part, by a desire or intention to serve Princeton. Chief Strother caused the criminal complaint and arrest report narrative to be issued while on campus and under his authority and responsibilities as Chief of Police, Assistant Vice President, and Sworn Officer to enforce the law and rules of the school and to coordinate with the prosecutor's office to pursue criminal charges against arrestees. Chief Strother falsely maintained criminal proceedings and testified against Piegaro in his capacity as Chief of Police.

116. Chief Strother acted under color of state law and under authority of Princeton.

117. As a direct and proximate result of Chief Strother's and Princeton's actions, Piegaro suffered damages, including physical injuries, economic injuries, and severe emotional distress, including post-traumatic stress disorder and anxiety. The deterioration in his mental health has interfered with his ability to sleep and function day-to-day. Piegaro now takes medication and regularly sees a therapist for his symptoms.

118. Accordingly, Piegaro is entitled to a judgment declaring that Chief Strother and Princeton violated his constitutional and state law rights, including the right to be free from malicious prosecution, and to all damages arising out of these violations.

SIXTH CAUSE OF ACTION

Against Chief Strother
Violation of the Fourth and Fourteenth Amendments to the U.S. Constitution
Violation of Article I, § 7 of the N.J. Constitution
Fabrication of Evidence
(Pursuant to 42 U.S.C. § 1983 and N.J.S.A. 10:6-2)

119. Piegaro hereby repeats, re-alleges, and incorporates the allegations set forth in the preceding paragraphs as if fully set forth herein.

120. Chief Strother fabricated evidence against Piegaro when he intentionally lied in his arrest report on which Piegaro's criminal charges were based. Chief Strother falsely stated in his arrest report that Piegaro fell down the steps, that he told Piegaro that Whig Hall was closed, that he used a "de-escalation method or tactic" by "providing [a] warning," and that Piegaro pushed into and grabbed him, among other things. Chief Strother's blatant falsehoods undermine any notion that probable cause existed to believe Piegaro was committing a crime.

121. Despite knowing that he fabricated the allegations against Piegaro, Chief Strother caused Piegaro to be seized, arrested and charged with four criminal offenses for which there was no probable cause, including aggravated assault on a police officer (fourth degree), N.J.S.A. 2C:12-1(b)(5)(a); defiant trespass (disorderly persons offense), N.J.S.A. 2C:18-3(b); obstruction of administration of law or governmental function (fourth degree), N.J.S.A. 2C:29-1(a); and resisting arrest by physical force or violence (third degree), N.J.S.A. 2C:29-2(a)(3). Had Chief Strother not made these falsified allegations to include in the criminal complaint, Piegaro would not likely have been criminally charged or prosecuted, as his accounts were the foundation for the criminal complaint, and video and photographic evidence, along with neutral witness testimony,

demonstrate their falsehood and that the elements of the charges were not satisfied. For example, Chief Strother did not exhibit evidence of his authority as a law enforcement officer, did not tell Piegaro that Whig Hall was closed, Whig Hall was not in fact closed, Piegaro did not grab Chief Strother, Piegaro did not resist, Piegaro did not fall of his own accord, and Piegaro did not enter Whig Hall.

122. Chief Strother's actions in the presentation of false and fabricated evidence, on which Piegaro was arrested, charged and prosecuted, were without probable cause and were made intentionally and maliciously, or with reckless disregard for their falsity.

123. Chief Strother acted under color of state law when he presented false and fabricated evidence on which Piegaro was arrested, charged, and prosecuted without probable cause.

124. As a direct and proximate result of Chief Strother's actions, Piegaro suffered damages, including physical injuries, economic injuries, and severe emotional distress, including post-traumatic stress disorder and anxiety. The deterioration in his mental health has interfered with his ability to sleep and function day-to-day. Piegaro now takes medication and regularly sees a therapist for his symptoms.

125. Accordingly, Piegaro is entitled to a judgment declaring that Chief Strother violated Piegaro's constitutional rights, and to all damages arising out of these violations.

SEVENTH CAUSE OF ACTION

Against Princeton
Municipal Liability – Failure to Train and Failure to Supervise
(Pursuant to 42 U.S.C. § 1983 and N.J.S.A. 10:6-2)

126. Piegaro hereby repeats, re-alleges, and incorporates the allegations set forth in the preceding paragraphs as if fully set forth herein.

127. As explained above, Piegaro was deprived of his federal and state constitutional rights because of Chief Strother's actions.

128. Chief Strother is a law enforcement officer and administrator, employed and supervised by Princeton.

129. Princeton's policies were inadequate to train its officers and employees to carry out their duties at protests and other events where university students were expected to attend as participants, observers, or reporters.

130. Princeton failed to supervise its officers and employees in carrying out their duties at such events.

131. Princeton knew or should have known that their officers and employees would confront students participating in, observing, or recording these protests, especially considering, among other things, the volume of campus protests nationwide and at Princeton following October 7, 2023, including campus encampments.

132. Chief Strother demonstrated a lack of training and supervision when he assaulted and arrested Piegaro for recording and reporting on the actions of university students, administrators, and police while in a public place and in compliance with the law. Chief Strother ignored Piegaro's right to record in public, even after Piegaro expressly asserted it.

133. It was readily foreseeable that Princeton's officers would violate the above-referenced constitutional rights of Princeton students like Piegaro if they assaulted and arrested them while exercising their right to record at public campus protests, including the protest on April 29. It was also readily foreseeable that their officers would face difficult choices about how to interact with student observers and reporters at contentious campus protests, including how to handle arrest reports and trial testimony.

134. Nor is there any doubt that the assault and arrest of a student who is not violating any law will often deprive that student of his or her rights under the United States Constitution and

the New Jersey Constitution. It is obvious that officers would need to know how to address students observing and reporting on major events like protests, and to be accurately apprised of alleged campus building closures before stopping students. The failure to train and supervise officers on how to treat students in light of the need to do so, and to testify truthfully, reflects Princeton's unconstitutional custom and policy of deliberate indifference to Piegaro's and other students' safety, well-being, and constitutional rights. Officers will likely continue to violate students' constitutional rights without adequate training and supervision, especially where here the violation was committed by the Chief of Police. It is predictable that without the necessary tools to handle these situations, officers' actions will violate students' rights.

135. Accordingly, Piegaro is entitled to a judgment declaring that Princeton proximately caused the violation of his rights under the United States Constitution and the New Jersey Constitution based on its failure to adequately train and/or supervise its police officers. Princeton further damaged Piegaro by proximately causing him to suffer physical injuries, economic injuries, and severe emotional distress, including post-traumatic stress disorder and anxiety. The deterioration in his mental health has interfered with his ability to sleep and function day-to-day. Piegaro now takes medication and regularly sees a therapist for his symptoms.

EIGHTH CAUSE OF ACTION

Against Chief Strother and Princeton
Intentional Infliction of Emotional Distress

136. Piegaro hereby repeats, re-alleges, and incorporates the allegations set forth in the preceding paragraphs as if fully set forth herein.

137. Chief Strother acted in an extreme and outrageous manner when he conducted a vicious, unprovoked, and humiliating attack against Piegaro by intentionally grabbing him, picking him up "like an open pair of scissors," and dropping him down the front steps of Whig Hall in

plain view of professors and peers, and then initiating and pursuing criminal charges against Piegaro without probable cause and based on known falsehoods. Chief Strother falsely stated in his arrest report that Piegaro fell down the steps, that he told Piegaro that Whig Hall was closed, that he used a "de-escalation method or tactic" by "providing [a] warning," and that Piegaro pushed into and grabbed him, among other things. Chief Strother also falsely testified at trial that Piegaro fell down the steps, that Whig Hall was closed at the time of the altercation, and that he was holding a police radio in his left hand. Video evidence and other trial testimony directly contradicts Chief Strother's lies—in reality, Chief Strother did not inform Piegaro that Whig Hall was closed (because it was not), he escalated the situation by initiating physical contact and dropping Piegaro down the steps, and he was not wearing a police radio or any other clothing identifying him as law enforcement. This shocking assault and false testimony designed to unjustly prosecute Piegaro would be intolerable from an average citizen, but is especially atrocious considering Chief Strother is a thirty-year veteran of law enforcement and Princeton's Chief of Police, and has a sworn duty to uphold the law and protect Princeton students such as Piegaro, and knew his conduct was unlawful and would result in severe emotional distress.

138. Chief Strother further acted intentionally or with reckless disregard for the severe emotional distress that Piegaro would suffer as a direct and proximate result of his extreme and outrageous actions when, on information and belief, he personally orchestrated Piegaro's campus ban, including directing officers to publicly escort him off campus without warning and without allowing him to retrieve his belongings from his campus apartment, and affording him no time to make alternative housing accommodations.

139. Based on the falsehoods peddled by Chief Strother and parroted by his officers, Princeton adopted and ratified Chief Strother's actions and punished Piegaro with a months-long

campus ban, a prolonged investigation, and a nine-month disciplinary probation, despite video and photographic evidence contradicting Chief Strother's and other Princeton employees' narratives. This protracted and baseless investigation was designed to intimidate and discourage Piegaro from taking legal action against Chief Strother, or speaking out about the school's discriminatory and unequal treatment. Princeton also incredibly did not interview Chief Strother, Officer Neiman, Detective Krzywicki, or other officers during its investigation.

140. Rather than discipline Chief Strother or other officers, or conduct a thorough investigation that would have exonerated Piegaro and exposed the officers' lies (even after prosecutors dropped most of the charges against Piegaro), Princeton gave Chief Strother an award two days after Piegaro was found not guilty on the only remaining charge after a two-day trial.

141. Princeton is independently and vicariously liable for Chief Strother's conduct because it occurred within the scope of his employment and was motivated, at least in part, by a desire or intention to serve Princeton. Chief Strother caused the criminal complaint and arrest report narrative to be issued while on campus, on duty, and under his authority and responsibilities as Chief of Police to enforce the law and rules of the school, and to coordinate with the prosecutor's office to pursue criminal charges against arrestees. Chief Strother falsely maintained criminal proceedings and testified against Piegaro in his capacity as Chief of Police.

142. As a direct and proximate result of Chief Strother's and Princeton's extreme and outrageous intentional and/or reckless conduct, Piegaro suffered damages, including physical injuries, economic injuries, and severe emotional distress, including post-traumatic stress disorder and anxiety. The deterioration in his mental health has interfered with his ability to sleep and function day-to-day. Piegaro now takes medication and regularly sees a therapist for his symptoms.

NINTH CAUSE OF ACTION

Against Chief Strother and Princeton
Negligent Infliction of Emotional Distress

143. Piegaro hereby repeats, re-alleges, and incorporates the allegations set forth in the preceding paragraphs as if fully set forth herein.

144. Chief Strother owed a duty not to inflict severe emotional distress on Piegaro in a foreseeable way. It is foreseeable that it would cause severe emotional distress to a student lawfully exercising his rights for Chief Strother to grab him, pick him up, drop him down the steps, hold him face-down on the ground by his wrist, falsely arrest him (all in plain view of professors and peers), and to maintain lies during the course of a baseless criminal prosecution.

145. Chief Strother breached his duty to Piegaro by intentionally grabbing him, picking him up "like an open pair of scissors," and dropping him down the front steps of Whig Hall in plain view of professors and peers, and then initiating and pursuing criminal charges against Piegaro without probable cause and based on knowing falsehoods.

146. Princeton is independently and vicariously liable for Chief Strother's conduct because it occurred within the scope of his employment and was motivated, at least in part, by a desire or intention to serve Princeton. Chief Strother caused the criminal complaint and arrest report narrative to be issued while on campus and under his authority and responsibilities as Chief of Police to enforce the law and rules of the school, and to coordinate with the prosecutor's office to pursue criminal charges against arrestees. Chief Strother falsely maintained criminal proceedings and testified against Piegaro in his capacity as Chief of Police.

147. Based on the falsehoods peddled by Chief Strother and parroted by his officers, Princeton adopted and ratified Chief Strother's actions and punished Piegaro with a months-long

campus ban, a prolonged investigation, and a nine-month disciplinary probation, despite Piegaro's video and photographic evidence showing his innocence and Chief Strother's unprovoked attack.

148. As a direct and proximate result of Chief Strother's and Princeton's actions, Piegaro suffered damages, including physical injuries, economic injuries, and severe emotional distress, including post-traumatic stress disorder and anxiety. The deterioration in his mental health has interfered with his ability to sleep and function day-to-day. Piegaro now takes medication and regularly sees a therapist for his symptoms.

JURY DEMAND

149. Plaintiff hereby demands a trial by jury.

PRAYER FOR RELIEF

WHEREFORE, Piegaro respectfully requests that this Court enter judgment in his favor and, in addition:

A. Declare that Defendants' restrictions on Piegaro's protected free speech rights in a public forum violated the First and Fourteenth Amendments to the U.S. Constitution and Article I, Sections 6 and 18 of the New Jersey Constitution;

B. Declare that Piegaro's assault, arrest, detention, and prosecution were unreasonable and unlawful and that Defendants violated Piegaro's rights under the Fourth and Fourteenth Amendments to the U.S. Constitution, Article I, Section 7 of the New Jersey Constitution, and New Jersey common law;

C. Declare that Defendants' violations of Piegaro's rights under the U.S. and New Jersey constitutions were proximately caused by the failure of Princeton to adequately train or supervise its officers;

D. Declare that Princeton is liable for the unlawful actions of its employees in violation of New Jersey law;

E. Award Piegaro an injunction requiring Princeton to vacate the findings and outcome of its disciplinary investigation, and expunge the violation from Piegaro's transcript and other school records;

F. Award Piegaro all appropriate damages, including compensatory, consequential, and punitive damages in an amount to be proven at trial, along with pre- and post-judgment interest;

G. Award Piegaro reasonable attorney's fees and costs under 42 U.S.C. § 1988 and N.J.S.A. 10:6-2; and

H. Grant any other relief the Court deems just and proper.

Dated: July 30, 2025
New York, New York

Respectfully submitted,

By: */s/ Andrew Schwartz*

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**Pro hac vice* application forthcoming

Attorneys for Plaintiff

CERTIFICATION PURSUANT TO LOCAL CIVIL RULE 11.2

Pursuant to Local Civil Rule 11.2, undersigned counsel for Plaintiff hereby certifies under penalty of perjury under the laws of the United States of America that the matter in controversy here is not the subject of any action pending in any other court, arbitration, or administrative proceeding.

CERTIFICATION PURSUANT TO LOCAL CIVIL RULE 201.1

Pursuant to Local Civil Rule 201.1, undersigned counsel for Plaintiff hereby certifies that this action is excluded from compulsory arbitration because it is based on an alleged violation of a right secured by the Constitution of the United States.

By: */s/ Andrew Schwartz*
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